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DISABILITY RIGHTS ADVOCATES
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1 UNITED STATES DISTRICT COURT
2

3 NORTHERN DISTRICT OF CALIFORNIA DANIEL

4 STEPHANIE ENYART

Case No.: C09-05191 CRB

5 Plaintiff,
6 v.

**STIPULATED REQUEST TO ENLARGE
TIME FOR FILING OF PLAINTIFF'S
MOTION FOR FEES AND COSTS AND
BILL OF COSTS.**

7 NATIONAL CONFERENCE OF BAR
8 EXAMINERS, INC.,

9 Defendant.
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1 **I. Action Requested**

2 Pursuant to Civil L.R. 6-2 and Civil L.R. 7-12 plaintiff Stephanie Enyart and
3 defendant National Conference of Bar Examiners ("NCBE") (hereinafter, "the parties"),
4 jointly stipulate and request an order extending by 30 days the filing deadline for
5 Plaintiff's motion for attorneys fees and costs and bill of costs, to December 4, 2011.

6 **II. Stipulation Regarding Requested Action**

7 IT IS HEREBY STIPULATED between and among the parties, by and through
8 their respective counsel of record, subject to the approval of the Court, which plaintiff
9 and defendant jointly request, as follows:

10 WHEREAS, on November 4, 2011, this Court entered final judgment for Plaintiff;

11 WHEREAS, to advance judicial economy and an expeditious resolution to the
12 litigation, the parties wish to explore the resolution of Plaintiff's claim for attorneys' fees
13 and costs through settlement;

14 WHEREAS, the parties agree that they will be unable to complete a good faith
15 negotiation regarding Plaintiff's claim for attorneys' fees and costs within the fourteen-
16 day period provided by Civil L.R. 54-5(a) and Fed. R. Civ. P. Rule 54(d)(2)(b);

17 WHEREAS, the parties have not previously requested or received any time
18 modifications for the motion for attorneys fees and costs; and

19 WHEREAS, the proposed time extension will at most delay resolution of the
20 attorneys' fees component of this case by only 16 days, but may expedite the resolution
21 of the case by clarifying and narrowing any remaining terms of disagreement following
22 negotiation, or by obviating the need for motion practice entirely.

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28 *Enyart v. National Conference of Bar Examiners, et al., Case No.: C09-05191 CRB*
STIPULATED MOTION TO EXTEND THE FILING DEADLINE TO FILE PLAINTIFF'S MOTION FOR
FEES AND COSTS.

1 THE PARTIES HEREBY STIPULATE AS FOLLOWS:

2 1. The period during which the Plaintiff must file any motion for attorney's fees
3 and costs and bill of costs shall be extended from within 14 days of entry of judgment by
4 the Court, to within 30 days of entry of judgment by the Court. The new deadline for
5 Plaintiff's motion for attorney's fees and bill of costs shall be December 5, 2011 (the first
6 court day following the extension).

7 Respectfully Submitted,

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9 Dated: November 11, 2011

DISABILITY RIGHTS ADVOCATES

10 By: /s/ Laurence Paradis

11 LABARRE LAW OFFICES, P.C.

12 By: /s/ Scott Labarre

13 BROWN, GOLDSTEIN AND LEVY, PLLC

14 By: /s/ Daniel F. Goldstein

15 Attorneys for Plaintiff

16 COOLEY LLP

17 By: /s/ Gregory C. Tenhoff

18 Attorneys for Defendant

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2 PURSUANT TO STIPULATION, IT IS SO ORDERED

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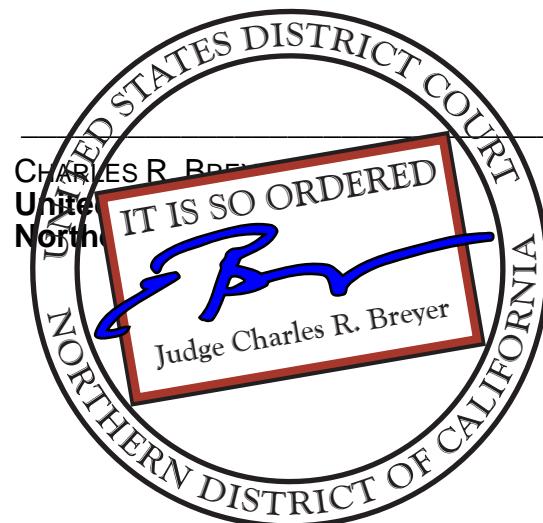
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